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Counsel for JANE DOES 1 THROUGH 22

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF CALIFORNIA

In re) Case No. 19-00271-LT13
)
MICHAEL PRATT,) Adversary No. 19-90022-LT
)
Debtor.)
)
)
JANE DOES 1 THROUGH 22,) PLAINTIFF JANE DOES 1 THROUGH
) 22'S ACCEPTANCE OF MICHAEL
Plaintiffs,) PRATT'S AND AARON SADOCK'S
) RULE 68 OFFER OF JUDGMENT
v.)
) Date: June 10, 2019
GIRLSDOPORN.COM,) Time: 10:00 a.m.
MICHAEL PRATT, et al,) Dept: 3
)
Defendants)
)
)

Plaintiff Jane Does 1 through 22, by and through their attorney of record, Michael T. O'Halloran, hereby give written notice of their acceptance of Michael Pratt's and Aaron Sadock's Rule 68 Offer of Judgment, hereby attached as Exhibit A.

1 Dated: May 30, 2019

LAW OFFICE OF MICHAEL T. O'HALLORAN

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By: /s/ Michael T. O'HALLORAN

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Michael T. O'HALLORAN

Counsel for

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Jane Does 1 through 22

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EXHIBIT A

Ajay Gupta, Esq. (#242132)
Chris S. Evans, Esq. (#293785)
GUPTA EVANS AND ASSOCIATES, PC
1620 5th Ave., Suite 650
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Attorneys for Defendants

Bradley M. Zamczyk, Esq. (#151753)
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E-mail: bzamczyk@hinshawlaw.com

Attorneys for Aaron Sadock and Panakos Law APC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA

IN RE:

MICHAEL J. PRATT

Debtor

JANE DOE NOS. 1 - 22,
Plaintiffs,

v.

MICHAEL J. PRATT, et al.,
Defendants.

Case No. 19-00271-LT13

Chapter 13

Hon. Laura S. Taylor

**RESPONDENTS MICHAEL J. PRATT
AND AARON SADOCK'S RULE 68
OFFER**

Hearing Information on Order Extending
Time as Docket ID# 57.

Hearing Date: May 1, 2019

Hearing Time: 2:00 PM

Location: Department 3

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, MICHAEL J. PRATT and
AARON SADOCK, ("Respondents") hereby offers to allow judgment to be taken against them in
In re Michael J. Pratt, United States Bankruptcy Court, Southern District of California, Case

RESPONDENTS MICHAEL J. PRATT AND AARON SADOCK'S RULE 68 OFFER

Case No. 19-00271-LT13

303766008v1 1018752

1 No.19-00271-LT13 and in favor of Plaintiffs, JANE DOE NOS. 1-22 ("Plaintiffs") as follows:

2 1. Judgment shall be entered against Respondents, jointly and severally, in favor of
3 Plaintiffs' in the total amount of \$110,000.00 in *In re Michael J. Pratt*, United States Bankruptcy
4 Court, Southern District of California, Case No.19-00271-LT13.

5 2. The \$110,000.00 judgment ("Judgment") to be entered is a full and final settlement
6 of all matters arising out of Case Nos.19-00271-LT13 and19-90022-LT in the Southern District
7 Bankruptcy Court of California and Case No. 19-CV-160-WQH-BLM in the Southern District
8 Court of California. Specifically, this settlement is intended as a full and final settlement of all
9 issues arising out of Plaintiffs' Motion for Sanctions filed as Docket ID Number 47 in Case
10 Number 19-00271-LT13 ("Motion"). The Judgment shall be joint and several as to Respondents
11 Aaron Sadock and Michael Pratt. Nothing in this settlement shall affect the Plaintiffs' ability to
12 pursue the underlying claims currently pending before Judge Wohlfield in case number 37-2016-
13 00019027-CU-FR-CTL in San Diego Superior Court. The Judgment amount represents full and
14 fair compensation for all reasonable attorneys' fees and costs Plaintiffs incurred in connection
15 with their alleged claims in the Motion.

16 3. If Respondents' offer is accepted, Plaintiffs agree to release all claims they have or
17 could have brought against Respondents and/or any of their parents, subsidiaries, affiliates,
18 officers, partners, employees, agents, attorneys, successors, predecessors and/or assigns arising of
19 MICHAEL J. PRATT'S January 23, 2019, bankruptcy filing, including all allegations alleged, or
20 which could have been alleged, in response to Respondents' filings and litigation activity in Case
21 Nos.19-00271-LT13 and 19-90022-LT in the Southern District Bankruptcy Court of California
22 and Case No. 19-CV-160-WQH-BLM in the Southern District Court of California, including, but
23 not limited to, any claims for costs, attorneys' fees, statutory penalties, sanctions, damages and
24 interest.
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2 4: This Offer is made solely for the purposes specified in Rule 68 of the Federal Rules

3 of Civil Procedure and is not to be construed as an admission that the Respondents are liable in

4 this action, that the Plaintiffs have suffered any damage, or for any other reason.

5 Dated April 15, 2018

GUPTA EVANS AND ASSOCIATES, PC

7 /s/ Ajay Gupta

Ajay Gupta, Esq.

Attorneys for Defendants

10 **HINSHAW & CULBERTSON LLP**

11 /s/ Bradley M. Zamczyk

Bradley M. Zamczyk, Esq.

Attorneys for Aaron Sadock and Panakos Law APC

PROOF OF SERVICE*In Re Michael Pratt*

US Bankruptcy Court, Southern District of CA, Case No. 19-00271-LT13

I am employed in the City and County of San Francisco. I am over the age of 18 years and not a party to the within entitled action. My business address is Hinshaw & Culbertson, One California Street, 18th Floor, San Francisco, California 94111.

On May 24, 2019, I served the within:

RESPONDENTS MICHAEL J. PRATT AND AARON SADOCK'S RULE 68 OFFER

on the following attorney(s) of record and/or interested parties in the above referenced case by depositing a true and correct copy (copies) by the following means:

☒ (BY HAND DELIVERY) By causing hand delivery to the following persons as noted:

☐ (BY ELECTRONIC MAIL): By transmitting a true copy thereof to the electronic mail addresses as indicated below.

☐ (BY CM/ECF SERVICE): I caused such document(s) to be delivered electronically via CM/ECF as noted herein.

Counsel for Plaintiffs

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Cara Van dorn
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Counsel for Plaintiffs

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Counsel for Plaintiffs

Brian M. Holm
HOLM LAW GROUP, PC
12636 High Bluff Drive, Suite 400
San Diego, CA 92130
Tel: (858) 707-5858
Email: brian@holmgroup.com

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed on May 24, 2019, at San Francisco, California.


Cynthia Peña

DECLARATION OF SERVICE

I, Michael T. O'Halloran, hereby declare that I am over 18 years of age, a resident of the County of San Diego, State of California, and am not a party to the within adversary proceeding, Jane Does 1 through 22 v. GirlsDoPorn.com, Michael Pratt et al, case no. 19-90022-LT.

On May 30, 2019, I served the following persons as indicated:

Via NEF service:

Ajay K. Gupta
Gupta Evans and Associates, PC
1620 5th Avenue, Ste. 650
San Diego, CA 92101
(619) 866-3444
ajay@guptalc.com

Thomas H. Billingslea, Jr., Esq.
Billingslea@thb.coxatwork.com

United States Trustee
ustp.region15@usdoj.gov

Via EMAIL

Bradley Zamczyk
Hinshaw & Culbertson LLP
One California Street, 18th Fl.
San Francisco, Ca 94111
bzamczyk@hinshawlaw.com

Via U.S. Mail, first class postage prepaid thereon:

Michael J. Pratt
10375 Cervaza Baja Drive
Escondido, CA 92026

Bradley Zamczyk
Hinshaw & Culbertson LLP
One California Street, 18th Fl.
San Francisco, Ca 94111

the following document:

PLAINTIFF JANE DOES 1 THROUGH 22'S ACCEPTANCE OF MICHAEL PRATT'S AND AARON SADOCK'S RULE 68 OFFER OF JUDGMENT

1 I declare under penalty of perjury that the foregoing is
2 true and correct to the best of my knowledge and belief and that
3 this declaration is executed on May 30, 2019, at San Diego,
4 California.

4 /s/ Michael T. O'Halloran
5 Michael T. O'Halloran
6 Law Office of Michael T. O'Halloran
7 110 West A Street, Suite 1100
8 San Diego, CA 92101
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